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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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OMAR COPELAND	:	
Plaintiff,	:	
	:	Civil Action
V.	:	No. 15-5012
	:	
CITY OF PHILADELPHIA, et al.,	:	
Defendants.	:	

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**Plaintiff fourth set of interrogatories and production of documents directed to defendants pursuant to rules 33 and 34, FED.R.CIV.P.**

Plaintiff Omar Copeland hereby requests, pursuant to federal rules of civil procedure, that defendants respond to the following interrogatories and document request. Responds is to be made within thirty (30) days

1. Directive 146 on foot pursuits
2. Directive 114 employee's responsibilities to report misconduct etc.
3. Defensive tactics training manual/ guide including PPD designed course work.
4. Police communication; defusing and de-escalation technique manual/guide including PPD designed course work.
5. Human relation cores work.
6. Police, public, and c.o.p course work.
7. All statements including in court testimony from any defendants pertaining to the arrest use of force to make the arrest.
8. Name the supervisor notified when force was used to make the arrest and plaintiff was taking to hospital pursuant to ppd policy.
9. Produce all relevant documents associated with the investigation of defendant Pearson physical abuse and tampering with evidence DC No: 04-14-050058 IA No: 04-1104. All investigation document pertaining to internal investigation IA No: 06-1102, investigation documents pertaining to IA No: 03-1150

B.

Omar Copeland Ik-6830  
1100 pike street  
Huntingdon, pa 16654

TO: SHANNON ZABEL

Re: discovery, 4<sup>th</sup> set of interrogatories and production of documents

Dear Ms. Zabel I 'am writing you because I sent you a discovery request over thirty days ago. You have not responded to my request in a timely fashion (30 days) as required by FED.R.CIV.P 34 (B) (2) (A). With all respect, I ask that you disclose all discovery request in plaintiff 4<sup>th</sup> set of interrogatories and production of documents and his supplemental request within three days of receiving this notice. If Plaintiff does not receive, the discovery sought. Plaintiff will be forced to have the courts compel defendants to turn over the discovery requested.

Respectfully submitted, Omar Copeland

A handwritten signature in cursive script that reads "Omar Copeland". The signature is written in dark ink and is positioned below the typed name.

Date: March, 6, 2017

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<b>OMAR COPELAND</b>	:	
<b>Plaintiff</b>	:	<b>Civil Action</b>
	:	<b>No.15-5012</b>
<b>v.</b>	:	
<b>CITY OF PHILADELPHIA, et al</b>	:	
<b>Defendants</b>	:	

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**PLAINTIFF SUPPLEMENTAL INTERROGATORIES AND PRODUCTION OF DOCUMENTS RELATED TO THE FOURTH SET OF INTERROGATORIES AND PRODUCTION OF DOCUMENTS PURSUANT TO RULE 33 AND 34, FED.R.CIV.P. Pleas answer within 30 days**

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15. Bates 500 to bates 554 dose not list the officers involved in these physical abuse complaints. The documents only identify the street, the claim of abuse and the findings by the IAD without the names of the officers involved in the physical abuse allegations. Please identify all offices who were the subject of each physical abuse complaint named in the documents bates 500 to 554.

16. In the physical abuse complaints listed in the bates 500-554. Send the plaintiff at least ten physical abuse complaint incidents were the officers were found in violation of department directives, policy, and citizens constitutional right. This includes documentation of the incidents.

17. The plaintiff request that defendant's produce the report produced in December 2003 by the integrity and accountability office of the PPD ( Review process of the IAD and the sufficiency of the disciplinary actions taken by the PPD in responds to complaints of misconduct were police were the subject of the report.

18. In accordance with the collaborative reform initiative an assessment team worked with the PPD and the COPS Office to monitor and assist in the implementation of the reforms recommended by the collaboration reform initiative, due to 48 finding and 91 recommendation. The department progress was published in two monitoring reports. Pleas disclose these two monitoring reports.